

# EXHIBIT 27

1  
2 UNITED STATES DISTRICT COURT  
3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 Index No. 1:18-cv-09936-LGS

5 CATHERINE MCKOY, MILLARD WILLIAMS,  
6 MARKUS FRAZIER, and LYNN CHADWICK  
7 individually and on behalf of all  
others similarly situated,

8 Plaintiffs,

9 -vs-

10 THE TRUMP CORPORATION, DONALD J. TRUMP,  
11 in his personal capacity,  
12 DONALD TRUMP, JR.,  
ERIC TRUMP, and IVANKA TRUMP,

13 Defendants.  
14 \_\_\_\_\_/

15  
16 VIDEOTAPED DEPOSITION OF DONALD J. TRUMP

17 Tuesday, October 11, 2022  
18 9:37 a.m. - 3:16 p.m.

19 The Mar-a-Lago Club  
20 1100 South Ocean Boulevard  
Palm Beach, Florida 33480

21  
22  
23 Stenographically Reported By  
24 Pamela J. Pelino, RPR, FPR, CLR  
Notary Public, State of Florida  
TSG REPORTING  
25 Job #:218087

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1 D.J. TRUMP

2 MR. ROBERT: If we could take five  
3 minutes. And the time, Ms. Reporter, just to  
4 be clear.

5 THE VIDEOGRAPHER: Off the record. The  
6 time is 10:33.

7 (A brief recess was taken.)

8 MS. KAPLAN: On the record.

9 THE VIDEOGRAPHER: On the record. The  
10 time is 10:43.

11 BY MS. KAPLAN:

12 Q. I'm going to shift gears a little bit,  
13 Mr. Trump, and we're going to go to a different  
14 topic.

15 Are you familiar with the company known  
16 as ACN?

17 A. Yes.

18 Q. Do you know what ACN stands for?

19 A. No. I did at one time. I don't remember  
20 now.

21 Q. Isn't it true that ACN is a multilevel  
22 marketing company?

23 A. I believe so, yes.

24 Q. And do you understand that to be the same  
25 thing as a network marketing company?

D.J. TRUMP

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2 A. No, I don't.

3 Q. What's the difference?

4 A. I don't know. I don't know.

5 Q. What is a multilevel marketing company?

6 A. It's a company that has various  
7 platforms, various things that they sell, and they  
8 sell them in different manner and form.

9 Q. And can you explain how a multilevel  
10 marketing company differs from a direct selling  
11 company?

12 A. No, I can't.

13 Q. What's an IBO?

14 A. I don't know.

15 Q. I take it from your last answer that you  
16 never became an IBO in ACN?

17 A. What is an IBO?

18 Q. Let me represent to that you IBO stands  
19 for independent business operator.

20 A. Yeah. I wouldn't have known that, no.

21 Q. And it's fair to say that you were never  
22 an ACN IBO?

23 A. No.

24 Q. And is it fair to say that to the best of  
25 your knowledge, no one in your family was a ACN IBO?



1 D.J. TRUMP

2 A. I believe that to be true.

3 Q. Sitting here today, do you know how a  
4 person became an IBO?

5 A. No.

6 Q. Sitting here today, do you know how much  
7 it costs to become an IBO?

8 A. No, I don't.

9 Q. Sitting here today, do you know how an  
10 IBO made money?

11 A. No, I don't.

12 Q. Sitting here today, do you know how an  
13 IBO's commissions were calculated by ACN?

14 A. No, I don't.

15 Q. Sitting here today, have you every heard  
16 the phrase "customer acquisition bonus" as used by  
17 ACN?

18 A. No.

19 Q. I take it, given that, you wouldn't know  
20 how IBOs earned customer acquisition bonuses?

21 A. No, I wouldn't. Had nothing to do with  
22 the company.

23 Q. Have you ever heard of the ACN phrase "A  
24 qualified team trainer"?

25 A. No.

D.J. TRUMP

Q. So you wouldn't know how an IBO became a qualified team trainer?

A. No.

Q. Do you know anything -- I take it for the same thing you wouldn't know the different levels above a qualified team trainer?

A. I wouldn't know that, no.

Q. Okay. Sitting here today, do you know whether attaining certain levels within ACN required IBO -- an IBO to recruit new IBOs into ACN?

A. No, I wouldn't know that.

Q. Have you seen an ACN compensation plan?

A. No.

Q. I take it you would therefore have no understanding of how their compensation plan worked?

A. No, I don't know that.

Q. Have you ever heard, in connection with ACN, the phrase "a downline"?

A. No.

Q. I take it you've never heard the phrase "an upline"?

A. No, I have not.

Q. I take it for the same reasons you have -- sitting here today, you don't know how IBOs

1 D.J. TRUMP

2 earn commissions, either, on downline sales?

3 A. No, I don't.

4 Q. Sitting here today, do you -- withdrawn.

5 Do you know -- sitting here today, do you  
6 recall ever knowing how many ACN IBOs made a profit  
7 in their first year?

8 A. I don't know. But I did speak to --  
9 during many speeches, I would speak to people that  
10 were involved with ACN. I'm not talking management;  
11 I'm talking about people that were involved. And  
12 they were tremendously happy, very happy.

13 I'd see large groups of people before I'd  
14 speak and sometimes after I'd speak, and they were  
15 tremendously happy. Some were in there for a long  
16 time. And I always remember that.

17 But I would see them almost all the time  
18 in large groups -- you know, fairly large groups or  
19 smaller groups or even individually, just by being  
20 there, by waiting to speak, et cetera, et cetera,  
21 and I'd meet people that were involved with ACN and  
22 they loved the company. That's one of the things  
23 that were -- you know, I mean, it was a company that  
24 was liked very much by the people I got to meet.

25 Q. So if I understand your testimony,



1 D.J. TRUMP

2 Mr. Trump, when you would give speeches for ACN,  
3 sometimes before the speech or sometimes after the  
4 speech --

5 A. Yeah. Randomly, yeah.

6 Q. -- you would meet with groups of people  
7 who were there who were involved with ACN; correct?

8 A. Yeah. As an example, they would come up  
9 and say could we have a picture. I'd say, what do  
10 you do? I don't know if you call the word  
11 "investor" or whatever you'd call it, but we're  
12 involved with ACN. I'd say, Good. How are you  
13 doing? Oh, we love the company, we love the  
14 company. They were very happy people.

15 And they were there for a long time, too.  
16 It wasn't just like they just joined. They were  
17 there for a long time.

18 Q. Okay. So some of those conversations  
19 would happen as a result of photo opportunities?  
20 They wanted to get your picture?

21 A. Yeah, photo opportunities and just being  
22 there.

23 Q. Okay. And --

24 A. And it wasn't set up by ACN. I mean,  
25 you'd just have -- you know, if I'd speak in front



1 D.J. TRUMP

2 of thousands of people, there were a lot of people  
3 around.

4 Q. Yeah. So just natural conversations that  
5 would take place either before or after speeches,  
6 sometimes --

7 A. Yeah.

8 Q. -- people would want to take --  
9 (Simultaneous speakers.)

10 THE WITNESS: Just being there.

11 BY MS. KAPLAN:

12 Q. And during those conversations, the  
13 general sense you had is the people who you spoke  
14 with in that capacity said they were very happy with  
15 the company?

16 A. I think in every instance. I don't think  
17 I ever had one that wasn't like somebody with a long  
18 face, somebody that wasn't happy. And these were  
19 people that were in that whole ACN system or  
20 whatever you might call it. They'd been there for a  
21 long time in many cases. Some were quicker, but  
22 they'd been there for -- in other words, they've had  
23 a long time and they were all happy. They all made  
24 money. I said, Have you done well? They said,  
25 We've done so great.

1 D.J. TRUMP

2 BY MS. KAPLAN:

3 Q. So, just to pack that apart if we can --  
4 or unpack that statement if we can.

5 The four people you met that you're  
6 referring to, those were the four founders of ACN?

7 A. Yes.

8 Q. Okay. And you said that after you met  
9 them, you had "One of my very smart people do  
10 research on the company"?

11 A. Yeah.

12 Q. Who was that person?

13 A. I think it was George Ross, who worked  
14 for me. I believe. It was a long time ago. But I  
15 believe -- George was a great guy, smart guy.  
16 He's -- I hope he's still around. I don't know if  
17 he is or not.

18 Q. I was just going to ask the question do  
19 you know if he's still alive?

20 A. I don't know. He may not be.

21 Q. What was his job for you?

22 A. He was a lawyer.

23 MR. ROBERT: Mr. Trump, sir, I'm just  
24 going to respectfully advise you that to the  
25 extent you had conversations getting legal

1 D.J. TRUMP

2 advice from him or anyone else, that these  
3 questions would be subject --

4 THE WITNESS: Well, he was a lawyer, so I  
5 don't know how you'd respond to that. But he  
6 was a --

7 He's an older guy, but very smart. He  
8 was an older guy then, so I haven't spoken to  
9 him in years.

10 BY MS. KAPLAN:

11 Q. Do you know when he left the Trump Org?

12 A. Well, he retired long time ago. Ten  
13 years ago, whatever.

14 Q. And do you know if as part of the  
15 research that he did, he produced any document?

16 A. I don't think so. I think he did  
17 research. He was a smart person, and he was just  
18 one of many people that liked it. They liked the  
19 company. The company is still here. Remember that:  
20 They're still here. Lot of companies aren't around  
21 anymore.

22 Q. I want to follow up with a question your  
23 counsel asked or the point that your counsel made,  
24 which is I take it from this video that you were  
25 asking Mr. Ross to do research about the company